

### Remarks

Claims 1-55 are currently pending. Claims 1-8, 10, 14-17, 19-20, 24, 26, 28, 30-33, 35, 48-50 and 52 have been amended. Claims 18, 21-23, 25, 27 and 29 have been canceled. No new claims have been added. No new matter has been included. Applicants assert that all claims are now in condition for allowance as set forth more fully below.

### Interview Summary

The undersigned participated in a telephone interview with the Examiner on April 20, 2005. During the interview, salient differences between the claimed invention and the Lin reference were discussed. Namely, it was emphasized that Lin teaches a system and method using input/output analysis. The Lin reference creates call scenario models then runs specific call feature combinations through the model to determine if the call features result in dropped calls or interference in call quality. It was pointed out that the claimed invention compares complete call feature lists of individual switches and checks enablement and disablement of loaded features. The Examiner suggested that such a comparison may inherently or indirectly be performed when determining call feature interference and further suggested that the claims be amended to clarify that embodiments do not concern call feature interference.

### 102 Rejections

Claims 1-55 stand rejected under 35 USC §102(b) as being anticipated by Lin (US Patent 6,185,519). Applicants respectfully traverse these rejections.

The Office Action rejects independent claims 1, 14, 26, 30, 35, 48 and 52 by stating that Lin teaches all of the elements. It appears that the Office Action equates one or more of the terms “feature interaction” and “feature specifications” in Lin to one or more of the terms “feature package information”, “feature package identifiers” and “feature package” in the above referenced claims. It also appears that the Office Action equates the phrase “detect interactions” in Lin with the phrase “compare” in the claims.

However, it should be noted that there are several fundamental differences between what Lin teaches and the claims.

In part, independent claims 1, 14, 26, 30, 35, 48 and 52 have now been amended to more clearly define the term, “feature package information”. However, it is important to note that Lin does not teach the subject matter recited in the claims and, as such, independent claims 1, 14, 26, 30, 35, 48 and 52 are allowable over the Lin. Applicants assert that all claims are in condition for allowance as set forth more fully below.

Claims 1-13, 30-34, 35-47, 48-51, and 52-55

Independent Claims 1, 30, 35, 48 and 52 have been amended, in part, to more clearly recite the side-by-side comparison of at least two lists of feature package identifiers and their operational status as received from their corresponding switches. For example in an embodiment where a switch is being added to a telecommunications system, claim 1 recites, in part comparing, side by side, the first set of feature package information with the second set of feature package information, to determine if a subset of feature packages that are loaded and enabled on the existing switch is identical to a subset of feature packages that are loaded and enabled on the additional switch, wherein the first and second sets of feature package information comprise a listing of the feature package identifiers corresponding to the feature packages loaded onto the existing and additional switches, respectively, and an indication as to whether one or more feature packages are enabled or disabled.

Lin teaches a method and a computer system **501** that electronically models a prospective call environment and two or more features then combines the call variable usage for each feature and compares the usages to detect potential feature interactions. (See Col. 4, l. 1-5). Lin defines “interactions” to mean 1) side effects, where a call prevents another feature from execution and 2) disabling, where one feature disconnects a call. (See Col. 4, l 16-25). In other words, Lin teaches an electronic, interactive call environment modeling method to detect system debilitating interactions between a plurality of features that may reside in two or more switches. Thus nothing in Lin discloses comparing complete static lists of features residing on two or more switches and their enabled status. Lin’s disclosure of an electronic call environment modeling

system is entirely different than a system to replicate and replace the process of manual verification of wire connections in a switch when a switch is being added to a system, replaced in a system or reconfigured in a system.

Accordingly, for at least these reasons, claims 1, 30, 35, 48 and 52 include recitations not disclosed by Lin and are allowable over Lin for at least these reasons. Dependant claims 2-13, 31-34, 36-47, 49-51 and 53-55 depend from allowable claims 1, 30, 35, 48 and 52 and are also allowable for at least the same reasons.

Claims 14-17, 19-20, and 24

Independent claim 14 has been amended to recite, in part, installing and programming one or more replacement switches, querying for and receiving an existing switch identifier associated with an existing switch, querying for and receiving one or more replacement switch identifiers associated with one or more replacement switches, receiving a first set of feature package information associated with the existing switch, receiving at least a second set of feature package information associated with the one or more replacement switches, wherein the first and second sets of feature package information comprise a listing of the feature package identifiers corresponding to the feature packages loaded onto the existing and the one or more replacement switches, respectively, and an indication as to whether one or more feature packages are enabled or disabled, comparing the first set of feature package information with the second set of feature package information to determine a common subset of feature packages existing on both the existing and replacement switches, identifying one or more feature packages having a operational status in the one or more replacement switches that is different from the operational status in the existing switch, conforming the set of one or more feature packages and their operating status on the one or more replacement switches to the feature packages and their operating status on the existing switch, and disconnecting the existing switch.

As noted above in relation to claims 1, 30, 35, 48, and 52, these recitations of claim 14 are also contrary to Lin. Lin does not teach comparing two static lists of feature identifiers from one or more switches and their operational status to determine if the same features in both switches are loaded and enabled. Lin models one or more feature

packages in a particular call environment to determine if there is a debilitation feature interaction. Accordingly, Lin fails to teach all the recitations of claim 14 and claim 14 is allowable over Lin for at least these reasons. Dependant claims 15-17, 19-20, and 24 depend from an allowable claim 14 and are also allowable for at least the same reasons.

#### Claims 26 and 28

Independent claim 26 has been amended to recite: A system for obtaining comprehensive feature package operational status of one or more switches comprising one or more telecommunications switches, the one or more telecommunications switches each including a plurality of feature packages, a communications network coupled to the one or more telecommunications switches and a computer coupled to the communications network and executing a plurality of instructions via a processor for querying the one or more telecommunication switches and obtaining a feature package operational status for each of the one or more switches, the computer including a feature package comparison data record wherein the feature package comparison data record contains feature package information and comprises: a feature package identifier field storing a feature package identifier corresponding to a feature package loaded onto a switch and a feature package operational status identifier field storing a feature package operational status identifier indicating whether the package is enabled or disabled. As noted above in relation to claims 1, 14, 30, 35, 48, and 52, these recitations of claim 26 are also contrary to Lin.

It should be noted that Lin teaches that pairwise feature interaction analysis is not sufficient to uncover all the interactions among a set of features (Col. 1, l. 47-49) and that the minimal required feature information required under Lin are the manufacture's feature specifications and data manipulation switch sequencing. (Col. 5, l. 26-27). Thus Lin is not concerned with comparing static lists of loaded switch features in a pairwise fashion and their enabled status. Nothing in Lin discloses the receiving of an actual and complete feature package listing for one or more switches and the pairwise comparison between feature package comparison data records between each switch for feature enablement. Furthermore, Lin's teaching the use of TCAP call models to determine input/output call interaction anomalies (Col. 5, l. 10-12 and l. 36-38) teaches away from

the claims that compares records for feature existence and enablement.

Accordingly, Claim 26 includes recitations not disclosed by Lin and is allowable for at least these reasons. Dependent claim 28 depends from allowable claim 26 and is also allowable over Lin for at least the same reasons.

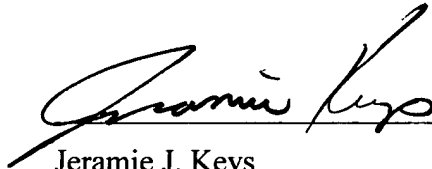
Conclusion

Claims 1-55 are pending. Claims 1-8, 10, 14-17, 19-20, 24, 26, 28, 30-33, 35, 48-50 and 52 have been amended. Claims 18, 21-23, 25, 27 and 29 have been canceled. . No new subject matter has been added. Applicants request that the 35 USC 102(b) rejection be withdrawn based on the remarks above and further request that a Notice of Allowability be provided. Should the Examiner have any questions, please contact the undersigned.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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